

**FILED****UNITED STATES DISTRICT COURT**

for the

Northern District of West Virginia

**AUG 29 2019**U.S. DISTRICT COURT-WVND  
MARTINSBURG, WV 25401

United States of America

v.

Elizabeth Jo Shirley

*Defendant(s)*

Case No.

**3:19MJ99****CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of July 19, 2019 - August 13, 2019 in the county of Berkeley County in the  
Northern District of West Virginia, the defendant(s) violated:*Code Section*

18, United States Code, 1204

*Offense Description*

International Parental Kidnapping

This criminal complaint is based on these facts:

See attached Affidavit (incorporated by reference).

☒ Continued on the attached sheet.*Complainant's signature*

David Rauser, FBI Special Agent

*Printed name and title*

Sworn to before me and signed in my presence.

Date:

August 29, 2019*Judge's signature*

City and state:

Martinsburg, WV

Robert W. Trumble, United States Magistrate Judge

*Printed name and title*